

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SAMANTHA JENKINS, EDWARD BROWN,)	
KEILEE FANT, BYEON WELLS, MELDON)	
MOFFIT, ALLISON NELSON, HERBERT)	
NELSON, JR., and TONYA DEBERRY, <i>et al.</i> ,)	
)	Case No.: 4:15-CV-00252-CEJ
Plaintiffs,)	
)	
v.)	
)	
THE CITY OF JENNINGS,)	
)	
Defendant.)	

**JOINT STATUS REPORT AND JOINT MOTION TO STAY ALL
PROCEEDINGS FOR AN ADDITIONAL 45 DAYS UNTIL MARCH 15, 2016**

COME NOW Plaintiffs and Defendant for their Joint Status Report and request for the Court to stay all proceedings for an additional 45 days until March 15, 2016, and state:

JOINT STATUS REPORT

1. The parties participated in mediation on January 15, 2016 and agreed in principle on a preliminary resolution of the case on a classwide basis.
2. The parties cannot report that the case has been finally resolved because there are details to be negotiated and finally decided and because at least one of the terms requires defense counsel to seek approval from the City Council and Mayor. In addition, the terms of the classwide settlement will require review and approval by this Court.
3. On January 19, 2016 lawyers Henson and Ryals met for over two hours in further negotiation over the details of several terms. They each report that meaningful progress was made and that there do not appear to be any points on which agreement will not occur.
4. The parties need additional time to negotiate the remaining issues related to the claims for damages, but will continue to negotiate those issues in a timely manner.

5. The parties will endeavor to have the matter finally resolved within the next 30 days.

MOTION TO STAY ALL PROCEEDINGS

1. On January 5, 2016, the Court entered an Order extending the stay of this case until February 1, 2016 (Doc. No. 21).

2. Given the foregoing, Plaintiffs will require sufficient time following final resolution to complete the motion to certify the class and the memorandum supporting it.

3. Plaintiffs will, of course, begin preparing the filings prior to final resolution. Parties anticipate that several of the unresolved terms will affect the final filings.

4. Plaintiffs expect that if the matter is finally resolved within the next 30 days, they can have the motion for class certification prepared and briefed in time to file by March 15, 2016.

5. Defendant City of Jennings will also need additional time to prepare and file an answer to the Plaintiffs' Complaint to join the issues in this case.

6. For the above reasons, Plaintiffs and Defendant request the Court to extend the stay of this case for 45 days until March 15, 2016 so the parties can complete the settlement negotiations and file appropriate pleadings with the Court.

WHEREFORE, Plaintiffs and Defendant respectfully request the Court to enter an Order granting this Joint Motion to Stay All Proceedings in this case for an additional 45 days until March 15, 2016.

Respectfully submitted,

EQUAL JUSTICE UNDER LAW

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